

November 8, 2017

Ex Parte

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Use of Spectrum Bands Above 24 GHz for Mobile Radio Services, GN Docket No. 14-177; IB Docket Nos. 15-256, 97-95; and WT Docket No. 10-112.

Dear Ms. Dortch:

On November 6, 2017, on behalf of Iridium Communications, Inc. (“Iridium”), I had a brief telephone discussion with Rachael Bender of Chairman Pai’s office about the above-captioned matter. On November 7, 2017, I had a brief telephone conversation with Erin McGrath of Commissioner O’Rielly’s office about this matter.

In both phone calls, I said that Iridium’s primary interest in this proceeding was the Commission’s treatment of the 29.1-29.25 GHz (A2) band, which Iridium uses to communicate with its satellite constellation. I said that Iridium supported the draft Order’s decision affirming a prior Commission decision “not to consider” the A2 band “for mobile use.”

As the draft Order says, the A2 band is too narrow for 5G services on its own, and is “not near other bands” that can be used for terrestrial mobile services. In addition, the draft Order is entirely correct in noting that “these bands were not identified for further study at WRC-15, which makes it less likely that equipment will be manufactured for the entire band.” The draft Order’s conclusion that Iridium’s co-primary satellite constellation “presents complex coexistence issues for which petitioners have proposed no workable solution” is also correct.

Accordingly, as to the A2 band, the Commission should adopt the conclusion and reasoning laid out in the draft Order.

Sincerely,



Scott Blake Harris
Counsel to Iridium Communications, Inc.

cc: Rachael Bender/ Erin McGrath